

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

NO. 5:21-CR-00434-M-1
NO. 5:21-CR-00434-M-2
NO. 5:21-CR-00434-M-4
NO. 5:21-CR-00434-M-5
NO. 5:21-CR-00434-M-6
NO. 5:21-CR-00434-M-7
NO. 5:21-CR-00434-M-9
NO. 5:21-CR-00434-M-10
NO. 5:21-CR-00434-M-11
NO. 5:21-CR-00434-M-12
NO. 5:21-CR-00434-M-13
NO. 5:21-CR-00434-M-14
NO. 5:21-CR-00434-M-15
NO. 5:21-CR-00434-M-16
NO. 5:21-CR-00434-M-19

UNITED STATES OF AMERICA)

v.)

CHRISTOPHER LAMAR BAKER)

ELIZABETH ANNE YOUNG)

a/k/a "PIPER")

KARA HERNANDEZ)

LANNY RAY BENTLEY)

ANGELA BOWMAN)

a/k/a "BOO BOO")

TED WESLEY CANNON)

a/k/a "BAM")

AMBER CROSS)

DEVAN CHRISTOPHER)

HOUSTON PHILLIPS)

KEVIN ROBERSON)

LANDON HOLCOMB)

JOSHUA PRESLEY)

a/k/a "DOZIER")

GARY STALEY)

a/k/a "MEATHEAD")

DUSTIN TRAVIS)

ASHLEY ELIZABETH HALL)

THIRD SUPERSEDING
INDICTMENT

The Grand Jury charges that:

COUNT ONE

Beginning on a date unknown to the Grand Jury, but no later than in or about October 2020, and continuing up to and including on or about November 17, 2021, in the Eastern District of North Carolina, and elsewhere, the defendants, CHRISTOPHER LAMAR BAKER, ELIZABETH ANNE YOUNG also known as “Piper” and KARA HERNANDEZ, LANNY RAY BENTLEY, ANGELA BOWMAN also known as “Boo Boo”, TED WESLEY CANNON also known as “Bam,” AMBER CROSS, DEVAN CHRISTOPHER, HOUSTON PHILLIPS, KEVIN ROBERSON, LANDON HOLCOMB, JOSHUA PRESLEY also known as “Dozier,” GARY STALEY also known as “Meathead,” DUSTIN TRAVIS and ASHLEY ELIZABETH HALL did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding with each other and other persons, known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute methamphetamine in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Controlled Substances Involved in the Conspiracy

With respect to KARA HERNANDEZ, LANNY RAY BENTLEY, ANGELA BOWMAN also known as “Boo Boo” and TED WESLEY CANNON also known as “Bam,” and ASHLEY ELIZABETH HALL the amounts involved in the conspiracy attributable to them as a result of their own conduct and the conduct of other

conspirators reasonably foreseeable to them, are five hundred (500) grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(b)(1)(A);

With respect to CHRISTOPHER LAMAR BAKER, ELIZABETH ANNE YOUNG also known as "Piper", AMBER CROSS, DEVAN CHRISTOPHER, HOUSTON PHILLIPS, KEVIN ROBERSON, LANDON HOLCOMB, JOSHUA PRESLEY also known as "Dozier," GARY STALEY also known as "Meathead," and DUSTIN TRAVIS and the amounts involved in the conspiracy attributable to them as a result of their own conduct and the conduct of other conspirators reasonably foreseeable to them, are fifty (50) grams or more of methamphetamine, a Schedule II Controlled Substance, in violation of Title 21, United States Code, Section 841(b)(1)(A).

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

On or about January 13, 2021, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER, aiding and abetting another, did knowingly and intentionally distribute fifty grams (50) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THREE

On or about June 4, 2021, in the Eastern District of North Carolina, the

defendants, CHRISTOPHER LAMAR BAKER and ELIZABETH ANNE YOUNG also known as “Piper,” aiding and abetting each other, did knowingly and intentionally distribute fifty (50) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FOUR

On or about June 4, 2021, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER, ELIZABETH ANNE YOUNG also known as “Piper,” aiding and abetting each other, did knowingly possess firearms, to include a short-barreled shotgun, as that term is defined in Title 18, United States Code, Section 921(a)(6), in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, as charged in Count Three of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

COUNT FIVE

On or about June 4, 2021, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER and ELIZABETH ANNE YOUNG also known as “Piper,” aiding and abetting each other, knowingly received and possessed a firearm, made from a shotgun having an overall length of less than 26 inches in total length, as that term is defined in Title 26, United States Code, Section 5845(a) and (f), specifically, a destructive device, which was not registered to them in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871 and Title 18, United States Code, Section 2.

COUNT SIX

On or about October 16, 2020, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER and AMBER CROSS, aiding and abetting each other, did knowingly and intentionally distribute fifty (50) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVEN

On or about October 30, 2020, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER did knowingly and intentionally distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHT

On or about November 6, 2020, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER, LANDON HOLCOMB and JOSHUA ISAAC PRESLEY, also known as "Dozier," aiding and abetting each other, did knowingly and intentionally distribute fifty (50) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT NINE

On or about December 4, 2020, in the Eastern District of North Carolina, the defendant, CHRISTOPHER LAMAR BAKER, did knowingly and intentionally distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

On or about December 10, 2020, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER and DUSTIN TRAVIS, aiding and abetting each other, did knowingly and intentionally distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT ELEVEN

On or about December 18, 2020, in the Eastern District of North Carolina, the defendant, CHRISTOPHER LAMAR BAKER, did knowingly and intentionally distribute fifty (50) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWELVE

On or about February 18, 2021, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER and DEVAN CHRISTOPHER, aiding and abetting each other, did knowingly and intentionally distribute fifty (50) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section

2.

COUNT THIRTEEN

On or about February 27, 2021, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER, DEVAN CHRISTOPHER, aiding and abetting each other, did knowingly and intentionally distribute five (5) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FOURTEEN

On or about February 27, 2021, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER, DEVAN CHRISTOPHER, aiding and abetting each other, did knowingly possess a firearm in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, as charged in Count Thirteen of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A) and Title 18, United States Code, Section 2.

COUNT FIFTEEN

On or about May 21, 2021, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER and HOUSTON PHILLIPS, aiding and abetting each other, did knowingly and intentionally distribute fifty (50) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SIXTEEN

On or about November 5, 2021, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER and GARY LEE STALEY, JR. also known as "Meathead," aiding and abetting each other, did knowingly and intentionally distribute fifty (50) grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SEVENTEEN

On or about November 5, 2021, in the Eastern District of North Carolina, the defendants, CHRISTOPHER LAMAR BAKER and GARY LEE STALEY, JR. also known as "Meathead," aiding and abetting each other, did knowingly possess a firearm, to include a machine gun, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, as charged in Count Sixteen of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(B)(ii) and Title 18, United States Code, Section 2.

COUNT EIGHTEEN

From a date unknown to the Grand Jury, but no later than in or about February 25, 2020, and continuing up to and including on or about July 5, 2021, in the Eastern District of North Carolina and elsewhere, the defendants, CHRISTOPHER LAMAR BAKER and ASHLEY ELIZABETH HALL, did knowingly combine, conspire, confederate, and agree with each other and with other persons, known and unknown to the Grand Jury, to commit offenses against the United States

in violation of Title 18, United States Code, Section 1956, to wit, to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which in fact involved the proceeds of a specified unlawful activity, that is, knowingly and intentionally distributing controlled substances, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and with the intent to promote the carrying on of such specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

[REMAINDER OF PAGE LEFT BLANK INTENTIONALLY]

FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any felony violation of the Controlled Substances Act charged herein, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offense.

Upon conviction of any violation of the Gun Control Act, the National Firearms Act, or any other offense charged herein that involved or was perpetrated in whole or in part by the use of firearms or ammunition, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and/or 26 U.S.C. § 5872, as made applicable by 28 U.S.C. § 2461(c), any and all firearms and ammunition that were involved in or used in a knowing or willful commission of the offense, or, pursuant to 18 U.S.C. § 3665, that were found in the possession or under the immediate control of the defendant at the time of arrest.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the

intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

~~FOREPERSON~~ //

DATE: 8-16-2022

MICHAEL F. EASLEY, JR.
United States Attorney

BY:

Robert J. Dodson for
KELLY L. SANDLING

Assistant United States Attorney
Criminal Division

BY:

Robert J. Dodson
ROBERT J. DODSON

Assistant United States Attorney
Criminal Division